

1 JASON M. FRIERSON
2 United States Attorney
3 District of Nevada
Nevada Bar No. 7709
VIRGINIA T. TOMOVA
4 Assistant United States Attorney
Nevada Bar Number 12504
5 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Virginia.Tomova@usdoj.gov

7 *Attorneys for the United States of America*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 KIM LISA HEATH,
11 Plaintiff,
12 v.
13 UNITED STATES OF AMERICA,
14 Defendant.

Case No. 2:24-cv-00155-CDS-BNW

**Stipulation and Order to Extend Time
to File a Response to Plaintiff's First
Amended Complaint**

(First Request)

15 Plaintiff Kim Lisa Heath and Defendant United States of America ("United
16 States"), through undersigned counsel, hereby submit this stipulation to extend the date to
17 file a responsive pleading.

18 Plaintiff filed her Complaint on January 23, 2024.

19 Plaintiff filed her First Amended Complaint on March 1, 2024.

20 The United States was served with Plaintiff's First Amended Complaint on March
21 12, 2024.

22 The current deadline for the United States to respond to Plaintiffs' First Amended
23 Complaint is May 13, 2024.

24 Plaintiff and the United States, through undersigned counsel, agree and stipulate
25 that the United States' time to respond to the Plaintiff's First Amended Complaint be
26 extended to June 13, 2024. This is the first request for an extension of time.

27 The extension of time is necessary due to a leave of the undersigned, heavy
28 workload, and office staffing shortages.

1 Therefore, the parties request that the Court extend the deadline for the United States
2 to answer or otherwise respond to Plaintiff's First Amended Complaint to June 13, 2024.

3 This stipulated request is filed in good faith and not for the purposes of undue delay.

4 Respectfully submitted this 8th day of May 2024.

5 THE COTTLE LAW FIRM

6 /s/Hayden R. Cottle, Esq.

7 ROBERT W. COTTLE, ESQ.
Nevada Bar No. 4576
8 HAYDEN R. COTTLE, ESQ.
Nevada Bar No. 16219
9 8635 South Eastern Ave.
Las Vegas, Nevada 89123

10 *Attorneys for Plaintiff*

U.S. ATTORNEY'S OFFICE

JASON M. FRIERSON
United States Attorney

/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney
501 South Las Vegas Blvd., Suite #1100
Las Vegas, Nevada 89101

Attorneys for the United States

12 **IT IS SO ORDERED:**

13 
UNITED STATES MAGISTRATE JUDGE

14
15 **DATED:** 5/10/2024

16
17
18
19
20
21
22
23
24
25
26
27
28